

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IRON MOUNTAIN INCORPORATED;  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.; C. RICHARD  
REESE; JOHN F. KENNY, JR.; GARRY  
B. WATZKE; LARRY L. VARN; and  
CHARLES G. MOORE,

Plaintiffs and  
Counterclaim-Defendants,

V.

THOMAS CARR,

Defendant and  
Counterclaim-Plaintiff.

CIVIL ACTION  
NO. 05 10890 RCL

**SECOND ASSENTED-TO MOTION TO EXTEND DEADLINE  
TO RESPOND TO MOTION FOR DISQUALIFICATION OF COUNSEL**

Plaintiffs and Counterclaim-Defendants Iron Mountain Incorporated, Iron Mountain Information Management, Inc., C. Richard Reese, John F. Kenny, Jr., Garry B. Watzke, Larry L. Varn and Charles G. Moore (collectively, the “Plaintiffs”), submit this motion for entry of a consent order extending the time for Plaintiffs to respond to or oppose Defendant’s Motion to Disqualify Plaintiffs’ Counsel (the “Disqualification Motion”). Plaintiffs are moving for an extension of the due date to Thursday, August 18, 2005.

On August 1, 2005, the Court granted an extension of time until August 12, 2005, for the Plaintiffs to respond to the Disqualification Motion. Owing to counsels' vacation schedules and the gathering of documents needed to respond to the motion to disqualify, the Plaintiffs are requesting a further extension (of less than one week) of the deadline to respond. The Defendant and Counterclaim-Plaintiff agree that the Plaintiffs should have additional time.

Additionally, the Plaintiffs will not oppose a request by the Defendant and Counterclaim-Plaintiff for leave of Court to file a reply brief in response to the Plaintiffs' response or opposition to the Disqualification Motion.

WHEREFORE, Plaintiffs' respectfully request an extension of the due date for its response to the Disqualification Motion until Thursday, August 18, 2005.

Dated: August 12, 2005

Respectfully submitted,

**IRON MOUNTAIN INCORPORATED;  
IRON MOUNTAIN INFORMATION  
MANAGEMENT, INC.; C. RICHARD  
REESE; JOHN F. KENNY, JR.; GARRY  
B. WATZKE; LARRY L. VARN; and  
CHARLES G. MOORE**

By their attorneys,

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**ASSENTED-TO ON BEHALF OF  
THOMAS CARR**

/s/ Read K. McCaffrey  
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